

EXHIBIT B

ALLYSON BROWNE (SBN 295139), pro hac vice
1730 Clement Street
San Francisco, CA. 94121
Telephone: (678) 938-3445
Email: Allysonbrowne11@gmail.com

Attorney for 7x7 EXPERIENCE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC., PASSENGER
SEXUAL ASSAULT LITIGATION

Civil Action. No. 3:23-md-03084-CRB

THIS DOCUMENT RELATES TO: ALL CASES

OBJECTIONS OF 7X7 EXPERIENCE TO
SUBPOENA DUCES TECUM

Pursuant to Federal Rules of Civil Procedure [“FRCP”] Rule 45(d)(2)(B), 7X7 EXPERIENCE [“7x7”] objects to Plaintiffs’ subpoena duces tecum on the following grounds:

7x7 is informed and believes that plaintiffs failed to comply with the requirements of FRCP Rule 45(a)(1)(D)(4) and 45(b)(1) in that plaintiffs failed to serve notice and a copy of the subpoena on each party in advance of service on 7x7; and, plaintiffs failed to serve notice on 7x7. (*Biocore Med. Technologies, Inc. v. Khosrowshahi*, 181 FRD 660, 667 (D KS 1998); *Pagan-Colon v. Walgreens of San Patricio, Inc.*, 264 F.R.D. 25, 28 (D.P.R. 2010).)

The subpoena is overly broad, unduly burdensome and oppressive in purporting to require production of documents in an unreasonably short time period (9 business days).

7x7 objects to the categories of documents listed in Schedule A of the subpoena as follows:

1. This category objected to on the grounds that it is overly broad, unduly burdensome and oppressive. This category is also objected to on the grounds that it is vague and ambiguous. This category is also objected to on the grounds that it seeks production of competitively sensitive trade secret information, the disclosure of which could be

1 highly damaging to 7x7's business. This category is also objected to on the grounds
2 that it invades the privacy of third parties.

3
4 **2.** This category objected to on the grounds that it is overly broad, unduly burdensome
5 and oppressive. This category is also objected to on the grounds that it is vague and
6 ambiguous. This category is also objected to on the grounds that it seeks production
7 of competitively sensitive trade secret information, the disclosure of which could be
8 highly damaging to 7x7's business. This category is also objected to on the grounds
9 that it invades the privacy of third parties.

10
11 **3.** This category objected to on the grounds that it is overly broad, unduly burdensome
12 and oppressive. This category is also objected to on the grounds that it is vague and
13 ambiguous. This category is also objected to on the grounds that it seeks production
14 of competitively sensitive trade secret information, the disclosure of which could be
15 highly damaging to 7x7's business.

16
17 **4.** This category objected to on the grounds that it is overly broad, unduly burdensome
18 and oppressive. This category is also objected to on the grounds that it is vague and
19 ambiguous. This category is also objected to on the grounds that it seeks production
20 of competitively sensitive trade secret information, the disclosure of which could be
21 highly damaging to 7x7's business.

22
23 **5.** This category objected to on the grounds that it is overly broad, unduly burdensome
24 and oppressive. This category is also objected to on the grounds that it is vague and
25 ambiguous. This category is also objected to on the grounds that it seeks production
26 of competitively sensitive trade secret information, the disclosure of which could be
27 highly damaging to 7x7's business.

6. This category objected to on the grounds that it is overly broad, unduly burdensome and oppressive. This category is also objected to on the grounds that it is vague and ambiguous. This category is also objected to on the grounds that it seeks production of competitively sensitive trade secret information, the disclosure of which could be highly damaging to 7x7's business.

7. This category objected to on the grounds that it is overly broad, unduly burdensome and oppressive. This category is also objected to on the grounds that it is vague and ambiguous. This category is also objected to on the grounds that it seeks production of competitively sensitive trade secret information, the disclosure of which could be highly damaging to 7x7's business.

DATED: 05/06/2024



ALLYSON BROWNE, ESQ., pro hac vice
Attorneys for Respondent, 7x7 EXPERIENCE

OBJECTIONS TO UBER CASE SUBPOENA

CASE NAME: UBER; USDC CASE NUMBER 3:23-md-03084-CRB

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am over the age of 18 years, and not a party to this action. My business address is 1730 Clement Street, San Francisco, California, 94121, which is in San Francisco County, California.

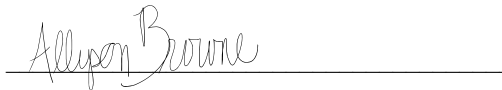
By 05/08/2024, the document named below will be served on the parties in this action as follows:

DOCUMENT SERVED: **OBJECTIONS OF 7X7 EXPERIENCE
TO SUBPOENA DUCES TECUM**

SERVED UPON: **SEE BELOW**

X (By Electronic Mail Where Indicated) I verify that the above-referenced document will be transmitted via electronic service to the parties named below on 05/07/2024.

X (By Personal Service) I verify that the above-referenced document will be personally served on the parties named below on or by 05/08/2024, with Proof of Service on the following page.



By: Allyson Browne, Esq.

By email & personal service:

SAMANTHA HOEFS
NIGH GOLDBERG RASO & VAUGHN
275 Battery Street
29th Floor
San Francisco, CA 94111-3339
Phone: (612) 445-0202
Email: shoefs@nighgoldenberg.com

OBJECTIONS OF 7X7 EXPERIENCE TO SUBPOENA DUCES TECUM - 4

